

## **Exhibit A**



 **(866) 333-2174**  
 Talk to a local advisor for FREE

**ASSISTED LIVING MEMORY CARE NURSING HOMES MORE LIVING OPTIONS PLANNING AND ADVICE HOW OUR SERVICE WORKS**

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## A Place for Mom Inc. Privacy Policy

- [A Place for Mom Inc. Privacy Policy \(U.S.\)](#)
- [A Place for Mom Inc. Privacy Policy \(Canada\)](#)

### A PLACE FOR MOM INC. PRIVACY POLICY (U.S.)

**(Effective Date: February 2016)**

This privacy policy explains the collection, use, and disclosure practices of this Web site as well as all other Web sites owned and/or operated by A Place for Mom, including, but not limited to [www.AssistedLiving.com](#), [www.](#)

[AlzheimersLocator.com](#), and [www.NursingHomes.com](#) (individually and collectively, "Site" or "Sites"). The Sites are maintained by A Place for Mom ("We," "Us," or "Our"). We may update this statement occasionally, and we encourage you to check the date of our privacy policy whenever you visit the Sites to see whether it has been modified since your last visit.

We do not sell your name, email address or other information, except to third parties which may provide or offer the services you've requested from us or as otherwise described below under Disclosure of Personal Information.

### COLLECTION OF PERSONAL INFORMATION

For services provided on or in connection with our Sites, we may ask you to provide personal information such as name, email address, phone number and zip code, and personally identifiable information, and may or may not include any other information provided by or for you, and/or provided by any other person for whom you may be seeking senior housing and/or care services ("Personal Information"). We may collect and store any Personal Information.

In addition, we may use Web site analytics tools, or other technologies, like cookies and Web beacons, to collect information about your visit to the Sites, including the pages you view, the links you click and other actions taken in connection with the Sites and our services. We also may collect certain standard information that your browser sends to every Web site you visit, such as your IP address, browser type and language, access times and referring Web site addresses. We also periodically

### HAVE QUESTIONS? FREE HELP IS AVAILABLE!

1. Enter Location:

2. Select Care Type:

**REQUEST INFO** >

Call toll-free:  
**(866) 333-2174**  
 8 a.m.-9 p.m.

may obtain both personal and non-personal information from other businesses, business partners, contractors and other third parties which supplements the Personal Information we collect, use and disclose.

Like many Web Sites, we use "cookies", which are small text files that are stored on your computer or equipment when you visit certain online pages that record your preferences. We use cookies to track use of our Sites and online services. We also may use cookies to monitor traffic, improve the Sites and make the Sites easier and/or relevant for your use. You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you usually can modify your browser setting to decline cookies if you prefer. If you choose to accept cookies, you also have the ability to later delete cookies that you have accepted. In Internet Explorer 8, you can delete cookies by selecting "Tools", "Delete browsing history". Then select the control box "Cookies" and click the "Delete" button. If you choose to delete cookies, any settings and preferences controlled by those cookies, including advertising preferences, will be deleted and may need to be recreated.

We also use cookies to improve the performance of our advertising on other websites. Although you may not opt out of receiving online advertisements generally, you may control the collection of data on our site used for targeted aplaceformom.com advertising during your visits to other websites. To opt-out of aplaceformom.com data collection for targeted advertising on other sites, click here: Opt Out Now. (<http://media.aplaceformom.com/optout.html>)

Please be advised that the practices described in this Privacy Policy apply to information gathered online at our Sites, and to information that you may submit to us offline; to Web sites maintained by other companies, or organizations to which we may link; and to Personal Information we may collect further from third parties.

## USE OF PERSONAL INFORMATION

We use Personal Information to provide you with the services you have requested from us and to provide services to the senior housing and care providers who have contracted with us ("Participating Communities") to be part of our referral information service program in relation to the services that we provide you. In addition, we use Personal Information to send you periodic email and newsletter communications about products and services offered by us or third parties, to operate and improve our Sites and services, to respond to customer inquiries, and to send you survey or other communications.

✦ We use Personal Information also for our own internal business purposes including statistical, design or operational purposes, such as to estimate our audience size, measure aggregate traffic patterns and understand demographic trends among our users.

## DISCLOSURE OF PERSONAL INFORMATION

including:

- **Participating Communities.** We may disclose, sell or share Personal Information to one or more Participating Communities in order to provide you with the services you've requested. The Participating Communities may contact you directly by email, telephone, regular mail, in person visits or other means. We do not control how these Participating Communities use or disclose your Personal Information.
- **Other Third Party Providers.** We may disclose, sell or share Personal Information to one or more third parties with whom we have contracted to provide services to us. We may also disclose Personal Information to one or more third parties who are interested in providing services or products to you. We do not control how these third parties use or disclose your Personal Information.
- **Affiliates.** We may disclose some or all of your Personal Information with our parent company, subsidiaries, joint ventures, or other companies under common control with us, in which case we will require them to honor this Privacy Policy.
- **Internal Analysis and Operations.** We may disclose Personal Information for our own internal statistical, design or operational purposes, such as to estimate our audience size, measure aggregate traffic patterns, and understand demographic trends among our users. We may outsource these tasks and disclose Personal Information about you to third parties, provided the use and disclosure of your Personal Information by these third parties is restricted to performance of such tasks and subject to confidentiality.
- **Legal and Other Compliance.** We may disclose Personal Information when we believe it is appropriate to comply with the law; to enforce or apply this Privacy Policy or our other policies or agreements; to protect our or our users' rights, property or safety; to protect our users from fraudulent, abusive or unlawful use of, our Sites; or if we reasonably believe that an emergency involving immediate danger of death or serious physical injury to any person requires disclosure of communications or justifies disclosure of records without delay.
- **Business Transfers.** We may disclose Personal Information as part of any merger, acquisition, debt financing, sale of company assets or other business transaction.
- **Aggregated Information:** We may share aggregated, anonymous information that includes or is based on information about you with third parties. This is information that is combined with the information of other users and does not directly identify you. Depending on the circumstances, we may or may not charge third parties for this aggregated information. We also may not limit the third parties' use of the aggregated information.

## USE OF NON-PERSONAL INFORMATION

Non-personal information collected at the Sites may be used and disclosed to improve the performance, functionality and content of the Sites. For example, we may collect and analyze collected aggregate information to determine how many visitors arrived at certain pages of the Sites, how long they stayed on those pages, and where they went afterwards. This information allows us to determine which pages might be the most interesting to our users and enables us to provide you

with a richer experience on the Sites. Additionally, we may use Personal Information to improve the performance of the Sites and to customize the content, features and layout of the Sites pages for you.

Occasionally we share aggregate information with third parties, such as our advertisers and business partners, for marketing and promotional purposes.

We may supplement aggregate information collected from the Sites with similar information obtained from companies with whom we have marketing or other business relationships and other third party sources. If aggregate information is ever linked with your Personal Information, such information will be treated as Personal Information for the purposes of this Privacy Policy as long as it is linked.

## LINKS TO THIRD PARTIES

Please be advised that we may provide links to third party Web sites from our Sites as a service to our users, but we have no ability to control, and are not responsible for, the privacy and data collection, use, and disclosure practices of such sites and the privacy policies of such Web sites may differ from the Sites. Therefore, we encourage you to review and understand the privacy policies of such Web sites before providing them with any information. These other Web sites also may send their own cookies to you, collect your data or solicit your Personal Information. Always be aware of where you end up. You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to accept cookies, you also have the ability to later delete cookies that you have accepted. In Internet Explorer 8, you can delete cookies by selecting "Tools", "Delete browsing history". Then select the control box "Cookies" and click the "Delete" button. If you choose to delete cookies, any settings and preferences controlled by those cookies, including advertising preferences, will be deleted and may need to be recreated.

## SECURITY

We use reasonable security measures to store and maintain Personal Information to protect it from loss, misuse, alteration or destruction by any unauthorized party while it is under our control. Please note that while we will make reasonable efforts to protect Personal Information, no transmission of data over the Internet is 100% secure. All Internet users should take care with how they handle and disclose their personal information. Please refer to the Federal Trade Commission's website at <http://www.ftc.gov/bcp/menus/consumer/data.shtm> (<http://www.ftc.gov/bcp/menus/consumer/data.shtm>) for information about how to help protect yourself against identity theft.

## THIRD PARTY ADVERTISING COMPANIES

Third party advertisers or ad networks may use cookies or other technologies on our Sites for various purposes, including measuring the effectiveness of their ads and analyzing and personalizing ads or other content delivered to you. We have no

ability to control the privacy and data collection, use, and disclosure practices of such Web sites and the privacy policies of such Web sites may differ from the Sites. Therefore, we encourage you to review and understand the privacy policies of such Web sites before providing them with any information.

## CHILDREN

We do not intend, and these Sites are not designed, to collect Personal Information from children under the age of 13. If you are under 13 years old, you should not register for our services or otherwise provide information on our Sites.

## YOUR CALIFORNIA PRIVACY RIGHTS

Companies that collect personally identifiable information from California residents and disclose such information to third parties for marketing purposes must, in response to a request by a consumer, either (1) provide a list detailing the categories of information shared and the entities to which such information was provided, or (2) provide a mechanism by which a consumer may opt-out of having their information shared with third parties. We have elected the second option and you may request that your personally identifiable information not be shared with third parties by sending your request, including your full name, email address and postal address to: A Place for Mom, Inc. Attn: General Counsel, 701 5th Ave, Suite 3200, Seattle, WA 98104. In accordance with California Civil Code Sec. 1789.3, California resident users are entitled to know that they may file grievances and complaints with California Department of Consumer Affairs, 400 R Street, Suite 1080, Sacramento, CA 95814; or by phone at 916-445-1254 or 800-952-5210; or by email to [dca@dca.ca.gov](mailto:dca@dca.ca.gov)

## DO NOT TRACK DISCLOSURES

No action is taken in response to web browser "do not track" signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personally identifiable information about an individual consumer's online activities over time and across third-party web sites or online services. Although we use Google Analytics and other third party tracking tools for our Sites, we are not aware if third parties collect personally identifiable information about an individual consumer's online activities when a consumer uses our Sites.

## YOUR CONSENT

By using our Sites, you consent to the terms of our Privacy Policy and to our collection, use, and disclosure of Personal Information for the purposes given above.

## OPT-OUT OF APFM COMMUNICATIONS

We may periodically send you newsletters and other communications that promote the use of our services. When you receive our newsletters, you may indicate a preference to stop receiving further newsletters by following the opt-out instructions that we include in the newsletter we send you. However, if you wish to

## CONSENT TO AUTOMATIC TELEPHONE DIALING SYSTEM

You agree to be contacted by a Senior Living Advisor and by our senior living partners and other partners to explore options at the telephone number you have provided. You agree we, our senior living partners and other partners may use automatic telephone dialing systems and technology to contact you by call or text message at the telephone number provided, even if you previously registered on a Do Not Call registry.

## QUESTIONS AND CONCERNS

If you have any questions about this Privacy Policy or the privacy practices of our Sites, please contact us at [privacy@aplaceformom.com](mailto:privacy@aplaceformom.com) (<mailto:privacy@aplaceformom.com>)

## GOVERNING LAW

The Sites are published in the United States. We attempt to comply with local data protection and consumer rights laws to the extent they may apply to our services. If you are uncertain whether this Privacy Policy conflicts with the applicable local privacy laws where you are located, you should not submit your Personal Information to the Sites.

## CHANGES IN THIS PRIVACY POLICY

As our Sites continue to develop, we may add new services and features to our Sites. In the event that these additions affect our Privacy Policy, this Privacy Policy will be updated appropriately. We will post those changes prominently so that you will know what Personal Information we gather, how we might use that Personal Information, and whether we will disclose it to anyone. We, however, recommend that you read this Privacy Policy each time you use our Sites in case you missed our notice of changes to the Privacy Policy. We will not materially change our policies and practices to make them less protective of Personal Information we have previously collected without your express consent.

## A PLACE FOR MOM CANADA, INC. WEB SITE AND GENERAL PRIVACY POLICY

(Effective Date: February 2016)

This Privacy Policy explains the collection, use, and disclosure practices of this Web site as well as all other Web sites owned and/or operated by A Place for Mom Canada Inc. ("APFM") and/or A Place for Mom, Inc. ("Parent"), including, but not limited to [www.APlaceForMom.com](http://www.APlaceForMom.com), [www.AssistedLiving.com](http://www.AssistedLiving.com), [www.Alzheimers.net](http://www.Alzheimers.net), [www.AlzheimersLocator.com](http://www.AlzheimersLocator.com), and [www.NursingHomes.com](http://www.NursingHomes.com) (individually and collectively, "Site" or "Sites"). The Sites are maintained by APFM

and/or its Parent, and any reference to "we," "us," or "our" includes both APM and its Parent. Any reference to "**you**" or "**your**" in this Privacy Policy refers specifically to the senior whose Personal Information (defined in the section titled "Collection of Personal Information" below) is being collected, used and disclosed and applies where the senior is either (a) seeking living or care services for himself or herself; or (b) has authorized another person to act on his or her behalf.

## **COLLECTION OF PERSONAL INFORMATION**

### **FOR THE PURPOSE OF FINDING SENIOR LIVING CARE SERVICES**

In order to assist you with finding senior living care services, after you (or a person authorized to act on your behalf) have read and understood our Privacy Policy and have consented to its terms and conditions, our Senior Living Advisors may ask you to provide personal information such as your name, email address, phone number and zip/postal code, and other personally identifiable information, and may or may not include any other information provided by or for you, and/or provided by any other person authorized to act on your behalf ("**Personal Information**"). This Personal Information will be collected over the phone and may be stored or accessed in Canada and/or the United States. This Personal Information may be disclosed in response to valid demands or requests from governments, regulators, courts and law enforcement authorities in those jurisdictions or countries.

### **FOR THE PURPOSE OF IMPROVING APFM SITES AND SERVICES**

In addition, we may use Web site analytics tools, or other technologies, like cookies and Web beacons, to collect information about your visit to the Sites, including the pages you view, the links you click and other actions taken in connection with the Sites and our services. We also may collect certain standard information that your browser sends to every Web site you visit, such as your IP address, browser type and language, access times and referring Web site addresses. We also periodically may obtain both personal and non-personal information about you from other businesses, business partners, contractors and other third parties which supplements the Personal Information we collect, use and disclose.

Like many Web sites, we use "cookies", which are small text files that are stored on your computer or equipment when you visit certain online pages that record your preferences. We use cookies to track use of our Sites and online services. We also may use cookies to monitor traffic, improve the Sites and make the Sites easier and/or relevant for your use. You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you usually can modify your browser setting to decline cookies if you prefer. If you choose to accept cookies, you also have the ability to later delete cookies that you have accepted. In Internet Explorer 8, you can delete cookies by selecting "Tools", "Delete browsing history". Then select the control box "Cookies" and click the "Delete" button. If you choose to delete cookies, any settings and preferences controlled by those cookies, including advertising preferences, will be deleted and may need to be recreated.



Please be advised that the practices described in this Privacy Policy apply to Personal Information gathered over the telephone by our Senior Living Advisors, online at our Sites, Personal Information that you may submit to us offline during the course of our dealings with you, Web sites maintained by other companies, or organizations to which we may link, and to Personal Information we may collect further from third parties.

## USE OF PERSONAL INFORMATION

### FOR THE PURPOSE OF FINDING SENIOR LIVING CARE SERVICES

We use Personal Information to provide you with the services you have requested from us and to provide services to the senior living and care providers who have contracted with us ("**Participating Communities**") by signing our Referral/Commission Agreement for Information Services ("**Referral & Commission Agreement**") and agreeing to be part of our referral information service program in relation to the services that we provide you. Based on the Personal Information that we have collected, we will provide you with the information about one or more of our Participating Communities whom we identify as options for your consideration. The Participating Communities then may contact you directly regarding their facilities or services. We will work with both you and the Participating Communities in your search.

We may share Personal Information with one or more third parties with whom we have contracted to provide services to us. Our contracts with these parties specify the purpose(s) for which Personal Information has been shared with them and the limited purpose(s) for which the Personal Information may be used by them. Our contracts with these parties also require that they implement privacy and security practices and procedures comparable to, or at least as stringent as those implemented by us, that they do not disclose Personal Information to any other third party, and that they comply with all applicable laws, including privacy laws.

### FOR THE PURPOSE OF INTERNAL BUSINESS ANALYSIS AND OPERATIONS

We may use Personal Information for our own internal statistical, design or operational purposes, such as to estimate our audience size, measure aggregate traffic patterns, and understand demographic trends among our users.

## DISCLOSURE OF PERSONAL INFORMATION

We require your permission and authorization to disclose Personal Information for the purpose of providing our senior living and care referral information service, and we will not disclose this information to anyone unless (a) you (or an individual authorized to act on your behalf) have consented to this disclosure; or (b) such disclosure is permitted or required by law.

### FOR THE PURPOSE OF FINDING SENIOR LIVING CARE SERVICES

In order to assist you with finding information about senior living care services, we may disclose Personal Information about you to other people and for the purposes specified below:

- **Participating Communities.** We may disclose Personal Information to one or more Participating Communities so that the Participating Communities may learn about the specific senior living care services that you are seeking and determine how they can assist you. Participating Communities may contact you directly by email, telephone, regular mail, in person visits or other means, based on your preference and as specified by you to the Senior Living Advisor during the initial collection of your Personal Information. We do not control how these Participating Communities use or disclose your Personal Information, however as per our Referral & Commission Agreement with each Participating Community, each Participating Community has agreed to limit its use of your Personal Information to (a) its own internal evaluation of potential residents; and (b) providing senior living and/or care services to such residents. Under the Referral & Commission Agreement, each Participating Community has also agreed to implement privacy and security practices and procedures comparable to, or at least as stringent as those implemented by us and not to disclose Personal Information to any third party.
- **Affiliates.** We may disclose some or all of your Personal Information with our Parent, subsidiaries, joint ventures, or other companies under common control with us, in which case we will require them to honour this Privacy Policy.

## OTHER RELATED PURPOSES

- **Legal and Other Compliance.** We may disclose Personal Information when we believe it is appropriate to comply with the law; to enforce or apply this Privacy Policy or our other policies or agreements; to protect our or our users' rights, property or safety; to protect our users from fraudulent, abusive or unlawful use of, our Sites; or if we reasonably believe that an emergency involving immediate danger of death or serious physical injury to any person requires disclosure of communications or justifies disclosure of records without delay.
- **Business Transfers.** We may disclose Personal Information as part of any merger, acquisition, debt financing, sale of company assets or other business transaction. Any Personal Information disclosed as a result will be subject to privacy protection comparable and at least as stringent as that employed by us.

## LINKS TO THIRD PARTIES

Please be advised that we may provide links to third party Web sites from our Sites as a service to our users, but we have no ability to control, and are not responsible for, the privacy and data collection, use, and disclosure practices of such sites and the privacy policies of such Web sites may differ from the Sites. Therefore, we encourage you to review and understand the privacy policies of such Web sites before providing them with any information. These other Web sites also may send their own cookies to you, collect your data or solicit your Personal Information. Always be aware of where you end up.

## SECURITY

We use reasonable security measures to store and maintain Personal Information to protect it from theft, loss, misuse, alteration or destruction by any unauthorized party while it is under our control. Please note that while we will make reasonable efforts to protect Personal Information, no transmission of data over the Internet is 100% secure. All Internet users should take care with how they handle and disclose their personal information. For some examples and information on protecting yourself from identity theft, please refer to the Office of the Privacy

Commission of Canada Web site at [http://www.priv.gc.ca/resource/topic-sujet/itf-vif/index\\_e.asp](http://www.priv.gc.ca/resource/topic-sujet/itf-vif/index_e.asp) and the United States Federal Trade Commission's Web site at <http://www.ftc.gov/bcp/menus/consumer/data.shtm> (<http://www.ftc.gov/bcp/menus/consumer/data.shtm>)

## **THIRD PARTY ADVERTISING COMPANIES**

Third party advertisers or ad networks may use cookies or other technologies on our Sites for various purposes, including measuring the effectiveness of their ads and analyzing and personalizing ads or other content delivered to you. We have no ability to control the privacy and data collection, use, and disclosure practices of such Web sites and the privacy policies of such Web sites may differ from the Sites. Therefore, we encourage you to review and understand the privacy policies of such Web sites before providing them with any information.

## **RECORDED TELEPHONE COMMUNICATIONS**

Telephone communications between You and APFM may be recorded or monitored for quality control purposes. By filling out any forms on the Sites or by providing information to us, you expressly consent to the recording of these telephone communications.

## **CONSENT TO AUTOMATIC TELEPHONE DIALING SYSTEM**

You agree to be contacted by Us, one of our third party providers, one of the senior living communities or care providers, or one of our affiliates to explore options at the telephone number you have provided. You agree we, our third party providers, the senior living communities or care providers, or our affiliates may use automatic telephone dialing systems and technology to contact you by call or text message at the telephone number provided, even if you previously registered on a Do Not Call registry.

## **CHILDREN**

We do not intend, and these Sites are not designed, to collect Personal Information from children under the age of 13. If you are under 13 years old, you should not register for our services or otherwise provide information on our Sites.

## **QUESTIONS AND CONCERNS**

If you have any questions or concerns about this Privacy Policy or the privacy practices of our Sites, please contact us at [privacy@aplaceformom.com](mailto:privacy@aplaceformom.com) (<mailto:privacy@aplaceformom.com>) or call us at 866-333-8445.

## **GOVERNING LAW**

The Sites are published in Canada and the United States. We attempt to comply with local data protection, privacy and consumer rights laws to the extent they may apply to our services. If you are uncertain whether this Privacy Policy conflicts with

## CHANGES IN THIS PRIVACY POLICY

As our Sites continue to develop, we may add new services and features to our Sites. In the event that these additions affect our Privacy Policy, this Privacy Policy will be updated appropriately, and we encourage you to check the date of our Privacy Policy whenever you visit the Sites to determine if it has been modified since your last visit. We will post changes prominently so that you will know what Personal Information we gather, how we might use that Personal Information, and whether we will disclose it to anyone. We, however, recommend that you read this Privacy Policy each time you use our Sites in case you missed our notice of changes to the Privacy Policy. We will not materially change our policies and practices to make them less protective of Personal Information we have previously collected without your express consent.

## ACCESS TO YOUR PERSONAL INFORMATION

Upon written request, you may access your Personal Information that is in our possession and request a correction or update of any such information.

## ACKNOWLEDGEMENT AND AUTHORIZATION

You confirm that you are:

- a) a senior seeking living and care services for yourself; or
- b) an individual authorized to act on behalf of a senior seeking living and care services and possess legal documents such as a Power of Attorney or Guardianship or hold other proof of being the substitute decision maker of the senior seeking living and care services.

## YOUR CONSENT TO THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

You confirm that you have read and understood this Privacy Policy and that you consent to the collection, use and disclosure of your Personal Information in accordance with the terms and conditions of this Privacy Policy.

## SIGN UP FOR THE SENIOR LIVING NEWSLETTER

Get the latest tips, news, and advice on aging and caregiving.

Enter your email address **GO**

## FOLLOW US





A Place for Mom is the largest assisted living referral service. We are paid by our participating communities, therefore our service is offered at no charge to families.

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